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17 *Attorneys for Plaintiff* CHROMA
18 MAKEUP STUDIO LLC

19 **UNITED STATES DISTRICT COURT**

20 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

21 CHROMA MAKEUP STUDIO LLC,

22 Plaintiff,

23 vs.

24 BOLDFACE GROUP, INC. and
25 BOLDFACE LICENSING +
26 BRANDING,

27 Defendants.

28 CASE NO.

COMPLAINT

Trial Date: None Set

29 Plaintiff Chroma Makeup Studio LLC, for its Complaint against Defendants
30 Boldface Group, Inc. and Boldface Licensing + Branding, states and alleges as
31 follows:

32 **THE PARTIES**

33 1. Chroma Makeup Studio LLC is a California limited liability company
34 having its principal place of business in Beverly Hills, California.

1 2. 1. Upon information and belief, Boldface Group, Inc. and its
2 subsidiary Boldface Licensing + Branding are Nevada corporations having their
3 principal places of business in Santa Monica, California.

4 **JURISDICTION AND VENUE**

5 3. 2. This is an action for trademark infringement and unfair
6 competition arising under the trademark laws of the United States, 15 U.S.C. § 1114
7 *et seq.*, under the California Business & Professions Code § 17200 *et seq.*, and under
8 the common law.

9 4. The Court has jurisdiction under 28 U.S.C. §§ 1338(a)-(b) and 1367.
10 Venue is proper under 28 U.S.C. § 1391(b)-(c).

11 **FACTS**

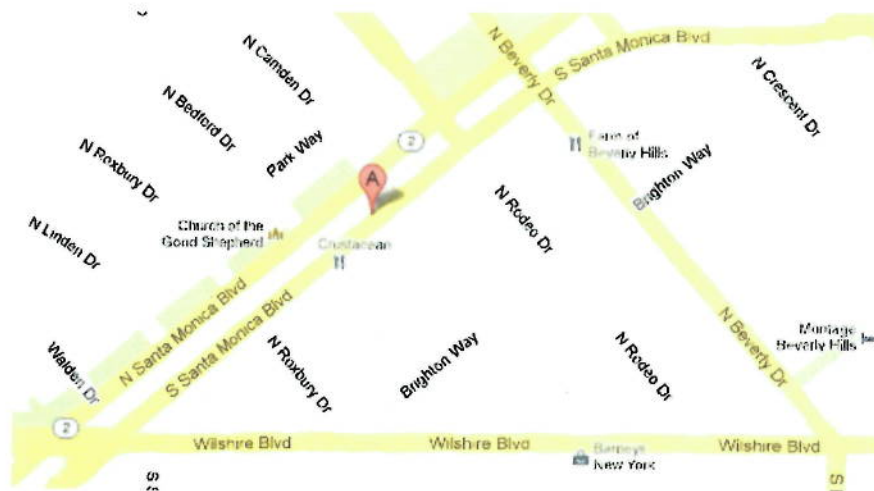
12 5. Chroma Makeup Studio LLC (“**Chroma**”) was founded in 2000 by Mr.
13 Michael Rey III and Ms. Lisa Casino, both of whom have more than two decades of
14 experience as makeup artists, and both of whom are recognized by their peers as
15 experts and masters in the fields of beauty, makeup, and eyebrow shaping services.

16 6. Since first opening its doors nearly twelve years ago in December of
17 2000, Chroma has been located at 9605 S. Santa Monica Boulevard in Beverly Hills,
18 California:





This location stands not only one block from the world-famous Rodeo Drive but also stands within the “Golden Triangle,” the most prestigious retail and commercial real estate district in the Los Angeles area, and one of the most famous and exclusive shopping districts in the world:



7. From that exclusive location on South Santa Monica Boulevard, Chroma has continuously used its CHROMA and CHROMA MAKEUP STUDIO trademarks in commerce in connection with its premier and individually customized

1 makeup and beauty services for the past twelve years:



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11
12 8. In addition, Chroma has used its CHROMA, CHROMA COLOUR, and
13 CHROMA MAKEUP STUDIO + C Design marks in commerce in connection with
14 cosmetics and beauty products and accessories continuously for the past twelve
15 years:





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(Hereinafter, the CHROMA, CHROMA COLOUR, CHROMA MAKEUP STUDIO, and CHROMA MAKEUP STUDIO + C Design marks are referred to as the “Chroma Marks.”)

9. Chroma has sold its exclusive beauty products and accessories from its permanent 9605 S. Santa Monica Boulevard location continuously for the last twelve years. During that twelve year span, Chroma products have been available at other locations in the Los Angeles area: from the Allen Edwards Salon (now called the C Salon after an ownership change), located at 12050 Ventura Blvd., Studio City, California 91604; from the G. K. Salon, located at 18590 Ventura Boulevard, Tarzana, California 91356; from the Estetica Salon, which is now closed but which was located at Brighton Way in Beverly Hills, California 90210; and from Hairlab, which is located at 22033 Clarendon Street, Woodland Hills, California 91367.

1 Currently, the only other brick & mortar location from which Chroma products can
 2 be obtained in Los Angeles is the Chroma Makeup Studio at Butterfly Loft, which is
 3 located at 17401 Ventura Boulevard in Encino, California 91316.

4 10. Chroma also sells its products online through its website at
 5 www.ChromaMakeupStudio.com, from which Chroma's loyal customers
 6 throughout the United States and overseas have obtain Chroma's beauty products
 7 and accessories for the last twelve years. In just the last eighteen months, Chroma
 8 has fulfilled orders and shipped products bearing the Chroma Marks to forty-one of
 9 the United States and to the District of Columbia. In addition, Chroma has shipped
 10 products to customers in Canada, Mexico, the United Kingdom, Belgium,
 11 Switzerland, Finland, and Japan.

12 11. While Chroma has common law trademark ownership rights that
 13 extend nationwide, the Chroma Marks are particularly strong and well-known in the
 14 Los Angeles area. Esteemed by celebrated Hollywood actors, Beverly Hills
 15 executives, and entertainment professionals for its expertise in providing in-studio
 16 and on-location makeup services and for its high quality line of cosmetics and
 17 accessories, Chroma has achieved a prominent place in the beauty industry and has
 18 made itself indispensable as a service provider to the entertainment industry.
 19 Among its prominent clientele, Chroma lists Rebecca Gayheart, Mary Kate Olsen,
 20 Ashley Olsen, Rachel Weisz, and Britney Spears. Customers who have posted
 21 reviews of Chroma on the Yelp.com website since 2006 have given Chroma Yelp's
 22 highest five star rating, have praised the owners with phrases like "Michael is an eye
 23 brow god!" and "Lisa is theeeeeeeeeeeee best!" and several have declared their
 24 devotion to Chroma products with phrases like "I haven't bought makeup anywhere
 25 else in years." In 2011, online visitors to the "LA Hotlist!" at the LA.CityVoter.com
 26 website voted Chroma number 1 in the beauty supply category.

27 12. Because Chroma has achieved prominence in the Los Angeles area for
 28 its expertise in beauty services, Chroma has received regular local media attention:

1 it has been featured at least five times in magazines such as *Los Angeles*
 2 *Confidential* and *Beverly Hills* and at least twice in the *Moxley Head to Toe Guide*
 3 *to Beauty Services in Los Angeles*.

4 13. The constant commitment to excellence of Lisa Casino and Michael
 5 Rey III over the twelve year span of Chroma's existence has caused Chroma's
 6 reputation to grow to the point at which it has received national notice and
 7 nationwide media attention through features in leading fashion magazines such as
 8 *Vogue*, *Elle*, *Self*, *Genlux*, and *Lucky*.

9 14. Twelve years of successful business growth; the hard work, expertise,
 10 and devotion of Chroma's owners Lisa Casino and Michael Rey III; the ongoing
 11 support and loyalty of Chroma's local, national, and international clientele; and the
 12 local and national media attention Chroma has received because of its reputation for
 13 excellence in the field of beauty products and services all attest to the considerable
 14 value of the CHROMA brand as expressed through the CHROMA, CHROMA
 15 COLOUR, CHROMA MAKEUP STUDIO, and CHROMA MAKEUP STUDIO +
 16 C Design trademarks (the "**CHROMA Marks**").

17 15. On information and belief, Boldface Group, Inc. and its subsidiary
 18 Boldface Licensing + Branding (collectively "**Boldface**") are companies that
 19 participate in the beauty industry primarily through marketing celebrity-endorsed
 20 products.

21 16. On June 6, 2012, Boldface issued a press release with the following
 22 headline: "BOLDFACE LICENSING+BRANDING ANNOUNCES KHROMA
 23 BEAUTY BY KOURTNEY, KIM AND KHLOÉ KARDASHIAN." The press
 24 release displays the following composite word+design trademark above the
 25 headline:



This composite mark is hereinafter referred to as the “**KHROMA BEAUTY mark.**” The press release states that “In every generation there are certain women who personify beauty and who become icons for the standard of beauty at that time . . . Kourtney, Kim, and Khloé Kardashian embody beauty, style, and fashion in a manner that is at once desirable and relatable to women worldwide.” The press release announces a “holiday assortment of . . . a stunning array of false eyelashes, a suite of mascaras, and Kardazzle Compacts” to be launched in December of 2012 at Ulta stores and that “a comprehensive launch” will occur in January and February of 2013. The press release further emphasizes that the Kardashians’ “immediate brand recognition factor gives Khroma Beauty an advantage over most launching brands as it holds a wide-ranging, aspirational appeal,” and that because Kourtney, Kim, and Khloé Kardashian are “truly iconic beauties,” their “true star quality . . . sets Khroma Beauty apart, making it an iconic brand.” The press release is archived on the “press” page at Boldface’s website at www.boldfacegroup.com.

17. On information and belief, Kourtney, Kim, and Khloé Kardashian (collectively, “**the Kardashians**”) are part of a prominent family of professionals, businesspersons, and world-famous television personalities. The Kardashians are the daughters of Kristen Mary Jenner (née Houghton) and her first husband, Robert

1 Kardashian, who was a famous lawyer and businessman. Kourtney Kardashian
 2 became a reality television personality in 2005 when she appeared in the series
 3 *Filthy Rich: Cattle Drive*, which was produced by E! Entertainment Television
 4 (hereinafter "E!"). Two years later, all three of the Kardashians became reality
 5 television stars when E! began producing a series called *Keeping Up with the*
 6 *Kardashians*. The E! series has shown enduring popularity, and *Keeping Up with*
 7 *the Kardashians* has now completed seven seasons and is anticipating its eighth.
 8 An estimated 3.6 million viewers watched the finale of the seventh season, and,
 9 accordingly, E! has contracted to produce and broadcast the show for at least two
 10 more seasons. In 2010, the *New York Post* reported that Kim Kardashian was the
 11 highest paid reality television star and received approximately six million dollars for
 12 her work in that year on the *Keeping Up with the Kardashians* series. As one
 13 indicator of the extremity the fame enjoyed by the Kardashians, Kim Kardashian
 14 currently has more than 16.6 million followers on Twitter. The series had led to
 15 other opportunities for the Kardashians. In 2009, E! aired a spin-off reality
 16 television program called *Kourtney and Kim Take Miami*, which ran for eighteen
 17 episodes over two seasons and is scheduled to resume in 2013. A second E! spin-
 18 off, *Kourtney and Kim Take New York*, began in 2011 and ran for twenty episodes
 19 over two seasons in the last two years. A third spin-off, *Khloé & Lamar*, which also
 20 features the Los Angeles Clippers basketball star Lamar Odom, began airing on E!
 21 in 2011 and also for twenty episodes over the last two years. In addition, in 2012,
 22 Khloé Kardashian was one of the hosts of Fox Television's *The X-Factor* series.
 23 Further, in 2010, the Kardashians authored a book entitled *Kardashian Konfidential*,
 24 which became a *New York Times* bestseller beginning in January of 2011. The
 25 global stardom which the Kardashians have achieved in television and printed media
 26 has also provided them with opportunities to earn substantial revenue through
 27 various product endorsements.

28 18. On information and belief, on August 26, 2012, an episode of *Keeping*

1 *Up with the Kardashians* aired on E! Entertainment Television which featured
 2 Nicole Ostoya, the Chief Executive Officer, President, and Director of Boldface
 3 Licensing+Branding, for the purpose of introducing the KHROMA BEAUTY mark
 4 to the Kardashians. In that episode, after displaying some product packaging
 5 prototypes and hearing the reactions of the Kardashians, Ostoya states, as the
 6 episode records, "We gave you a couple different ideas for brand names, and, I
 7 think, immediately everybody gravitated towards KHROMA, which we were super
 8 happy about because we love that too." A clip from the August 26, 2012 episode in
 9 which the statement quoted above occurs is currently archived on the "press" page
 10 at Boldface's www.boldfacegroup.com website.

11 19. In the weeks that followed the August 26, 2012 episode of *Keeping Up*
 12 *with the Kardashians*, Lisa Casino and Michael Rey III began to receive concerned
 13 and worried communications from their clients, employees, and potential licensing
 14 partners in regard to the impending launch of the KHROMA BEAUTY products.
 15 All of these communications indicate that substantial and extensive consumer
 16 confusion has already occurred based on Boldface's pre-launch advertising
 17 campaign for the KHROMA BEAUTY mark.

18 20. Chroma's clients have expressed a variety of concerns which have
 19 ranged from worry to anxiety to outrage. Clients have wondered whether Chroma
 20 has become associated with the Kardashians, whether Chroma has licensed or sold
 21 its mark to the Kardashians, whether Chroma products will now be changed so that
 22 they can be marketed inexpensively in major retail stores, whether they should
 23 continue to purchase CHROMA products if people will mistakenly perceive
 24 CHROMA products as KHROMA BEAUTY products, whether Chroma itself is
 25 changing and moving away from its established traditions of individualized makeup
 26 services performed with expertise and uniquely customized cosmetics products
 27 provided with expert consultation, whether Chroma is going to discontinue its
 28 premier line of cosmetics and its elite makeup services, and/or whether Chroma is

1 going out of business.

2 21. Chroma's employees have expressed concerns about job security and
3 future pay because they rely on commissions from the sales of CHROMA products
4 for a large portion of their income. Chroma's employees are highly sensitive to the
5 very real danger that Chroma's clients will refrain from purchasing CHROMA
6 products for fear that other people will mistakenly believe that they are wearing
7 KHROMA BEAUTY products. Despite trying to provide reassurances to their
8 employees, Lisa Casino and Michael Rey III are dealing with the many effects that
9 these feelings of job insecurity among their employees are having upon productivity
10 in the Chroma Makeup Studio.

11 22. For the past several months, Chroma has been building resources and
12 developing relationships to allow Chroma to increase and expand its product sales
13 through a collaborative licensing arrangement. One such potential licensing partner,
14 Guthy Renker, discontinued promising discussions with Chroma after the Boldface
15 press release issued in June of this 2012 because of the perceptions of the potentially
16 negative effects that the launch of the KHROMA BEAUTY products will have on
17 Chroma's sales. In addition, Chroma's consultant for developing licensing
18 opportunities has informed Chroma that its planned overtures to Sephora and QVC,
19 two other potential licensees with whom Chroma aspires to have relationships, will
20 have to be suspended until Chroma can provide these potential partners with the
21 reassurance that the KHROMA BEAUTY mark will not impair Chroma's future
22 sales.

23 23. On October 29, 2012, in an effort to prevent further consumer
24 confusion and to control the damage being done to its current business and to its
25 future business expansion opportunities by the pre-launch publicity for the
26 Kardashians' KHROMA BEAUTY brand, Chroma posted a letter to its clients on its
27 website in which it declared that Chroma is not associated with the Kardashians.

28 24. Four days later, on November 2, 2012, Chroma sent Boldface a cease &

1 desist letter to inform Boldface of Chroma's prior trademark rights, of the injury that
2 the pre-launch publicity for the KHROMA BEAUTY brand is doing to Chroma, and
3 to demand that Boldface either change its proposed brand for the Kardashians'
4 cosmetic line to a trademark that is not confusingly similar to the CHROMA Marks
5 or to contact Chroma immediately to discuss other potential resolution scenarios.

6 25. Counsel for Boldface responded to Chroma's letter and a telephone
7 conversation followed on November 6, 2012, but the telephone call did not result in
8 a solution that would minimize the consumer confusion and misperception that
9 currently exists and continues to grow among Chroma's clients, and thereby end the
10 ongoing injury under which Chroma currently suffers. In addition, Boldface made
11 no promise to cooperate with Chroma's effort to advance the Lanham Act's mandate
12 that consumers should be protected from confusion, mistake, and deception in the
13 marketplace.

14 26. On information and belief, on November 8, 2012, Boldface shipped
15 KHROMA BEAUTY products to approximately 4,500 retail store chains throughout
16 the United States, including Ulta, Sears, CVS, K-Mart, and Fred Meyer, so that
17 those stores could begin selling to customers.

18 27. Chroma tried several additional times to initiate discussions with
19 Boldface on November 9th, 12th and 13th, but Chroma did not receive a satisfactory
20 response to any of its communications.

21 28. On information and belief, as of November 14, 2012, if not earlier,
22 Boldface's KHROMA BEAUTY products are being purchased by customers in Ulta
23 stores in Southern California, including in the Los Angeles area. On information
24 and belief, the products being sold include false eyelashes, mascaras, overall face
25 palette kits, eyeliners, and lip sets. These KHROMA BEAUTY products are also
26 now available online through the www.ulta.com website, the www.sears.com
27 website, and through the www.amazon.com website.

28 29. Faced with the facts of actual sales of KHROMA BEAUTY products

1 and the fact that Boldface has been unresponsive to Chroma's communications in
 2 regard to discussing a potential resolution that would minimize consumer confusion,
 3 Chroma determined on November 15, 2012 that preparing this complaint had
 4 become a necessity. By launching its KHROMA BEAUTY products with full
 5 knowledge of Chroma's concerns, Chroma's twelve years of prior trademark rights,
 6 and the clear evidence of confusion actually occurring among Chroma's clients,
 7 Boldface has harmed Chroma, violated Chroma's long-established intellectual
 8 property rights, injured Chroma's business, willfully infringed Chroma's common
 9 law trademark rights that are protected under both federal and state laws, and
 10 knowingly caused actual confusion among persons in the marketplace. Chroma
 11 brings this lawsuit to request relief from Boldface's infringement of Chroma's
 12 intellectual property rights and to uphold public policy, inherent in the provisions of
 13 the Lanham Act and in state laws, prohibiting business activities that deceive or
 14 confuse consumers.

15 30. The foregoing allegations are incorporated into each count below.

16 COUNT ONE

17 Trademark Infringement

18 31. Chroma realleges and incorporates herein by reference all of the
 19 allegations in the preceding paragraphs as though fully set forth herein.

20 32. Boldface's conduct infringes Chroma's trademark rights under the
 21 Lanham Act, 15 U.S.C. § 1125(a)(1), and Chroma has suffered damages as a result
 22 of Boldface's infringement in an amount to be proven at trial.

23 33. Chroma's CHROMA, CHROMA COLOUR, CHROMA MAKEUP
 24 STUDIO, and CHROMA MAKEUP STUDIO + C Design marks have acquired
 25 considerable distinctiveness through twelve years of continuous use. The Chroma
 26 Marks are in use nationwide, but Chroma's overall CHROMA brand is extremely
 27 strong and well-known as a premier brand among beauty products and services
 28 consumers in the Los Angeles area. The KHROMA BEAUTY mark, on the other

1 hand, has acquired no distinctiveness because Boldface has only just initiated actual
2 use in the past week; however, the KHROMA BEAUTY mark, as an overall brand,
3 has already attracted global attention due to the notoriety of the Kardashians.

4 34. The KHROMA BEAUTY mark is nearly identical and certainly
5 confusingly similar in appearance, pronunciation, meaning, and commercial
6 impression to Chroma's marks containing the CHROMA term. The dominant
7 elements in the marks, KHROMA and CHROMA, are pronounced identically, have
8 identical meanings, and are nearly identical in appearance. Actual consumer
9 confusion has already occurred, and these shared qualities make it very likely that
10 confusion will continue to occur among consumers.

11 35. The goods identified by Chroma's marks and by the KHROMA
12 BEAUTY mark are nearly identical and certainly highly related, and the goods are
13 marketed to customers in similar channels of trade, which makes it highly likely that
14 the consumer confusion which has already occurred will continue to occur and
15 expand among consumers.

16 36. Chroma is aware of many instances of actual consumer confusion and
17 has ample evidence of such occurrences of actual consumer confusion.

18 37. Chroma's clients exercise a high degree of care in choosing their
19 beauty products, and Chroma's employees exercise a high degree of care in assisting
20 clients in choosing the particular beauty products most suited to their features and to
21 show them to advantage. On the other hand, the consumers who purchase the
22 KHROMA BEAUTY products, which are being mass marketed at major retail
23 chains at inexpensive prices, are not likely to exercise a high degree of care in
24 making their purchases, which makes it highly likely that the consumer confusion
25 which has already occurred will continue to occur.

26 38. Chroma had been planning a major expansion effort for its products
27 with potential business collaborators and licensees when Boldface, with apparent
28 intention of flooding the market with advance publicity for its KHROMA BEAUTY

1 brand, extinguished Chroma's current business expansion opportunities by creating
 2 a perception among such potential licensees that Chroma's sales will be
 3 significantly impaired and lessened by the launch of the KHROMA. Although
 4 Chroma is a well-established senior user with a highly estimable reputation and
 5 public recognition as a premier beauty goods and services provider in the Los
 6 Angeles area in support of its CHROMA brand, the junior user Boldface possesses,
 7 because of the personal fame and celebrity of the Kardashians, the ability to attract
 8 instant global attention for the KHROMA BEAUTY brand, and Boldface is using its
 9 power to overwhelm Chroma in the marketplace.

10 39. Based on all of the foregoing facts, Boldface's conduct has caused, is
 11 causing, and will continue to cause irreparable harm to Chroma and to Chroma's
 12 trademark rights under the Lanham Act, 15 U.S.C. § 1125(a)(1) unless Boldface is
 13 enjoined by this Court.

14 40. The Court should further find that this is an exceptional case under 15
 15 U.S.C. § 1117 and award Chroma treble damages and attorneys' fees.

16 COUNT TWO

17 Unfair Competition under California Law

18 41. Chroma realleges and incorporates herein by reference all of the
 19 allegations in the preceding paragraphs as though fully set forth herein.

20 42. California Business & Professions Code § 17200 provides that unfair
 21 competition includes "any unlawful, unfair or fraudulent business act or practice and
 22 unfair, deceptive, untrue or misleading advertising."

23 43. California Business & Professions Code § 17202 provides that
 24 "specific or preventive relief may be granted to enforce a penalty . . . in a case of
 25 unfair competition."

26 44. While the commercial laws of California encourage free enterprise and
 27 entrepreneurship, a junior trademark owner cannot disregard a senior trademark
 28 owner's prior rights by choosing a nearly identical trademark and then running

1 roughshod over the senior trademark owner simply because the senior user is small
 2 and the junior is large, extremely well-funded, allied with world famous celebrities,
 3 and consequently has the power to do so. Such behavior constitutes an unfair
 4 business practice and contravenes the California Business and Professions Code.
 5 Having chosen the KHROMA BEAUTY trademark, Boldface has attempted,
 6 through the Kardashians' star-power to attract massive publicity, to disregard
 7 Chroma's CHROMA Marks and crush Chroma under the juggernaut of its advance
 8 marketing for the launch of the KHROMA BEAUTY brand products and,
 9 subsequently, under its nationwide product launch. Boldface's conduct constitutes
 10 unfair competition, which is prohibited under California Business & Professions
 11 Code § 17200 *et seq.*

12 45. Boldface's conduct has caused, is causing, and will continue to cause,
 13 irreparable harm to Chroma unless it is enjoined by this Court.

14 46. Chroma has suffered damages as a result of Boldface's unfair
 15 competition in an amount to be proven at trial.

16 **JURY DEMAND**

17 47. Chroma demands a jury trial.

18 **RELIEF**

19 **WHEREFORE**, Plaintiff asks the Court to:

- 20 1. Enter judgment in favor of Chroma in an amount to be proven at trial;
- 21 2. Enjoin Boldface and its officers, agents, servants, directors, employees,
 22 affiliated entities, and those persons in active concert or participation with any of
 23 them, from using the KHROMA BEAUTY mark and/or any other brand, symbol,
 24 trademark service mark, product design or product packaging which is confusingly
 25 similar to Chroma's CHROMA Marks.
- 26 3. Award Chroma its costs and attorneys' fees incurred in this action;
- 27 4. Award Chroma enhanced damages because of the willful nature of
 28 Boldface's trademark infringement; and

1 5. Grant any other relief the Court deems just and equitable.
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3

4 DATED: November 19, 2012

LEWIS BRISBOIS BISGAARD & SMITH LLP

5
6 By: 
7 Deborah F. Sirias

8
9 DATED: November 19, 2012

FREDRIKSON & BYRON, P.A.

10
11 By: 
12 Paul E. Thomas
13 Lora M. Friedemann

14 Attorneys for Plaintiff CHROMA
15 MAKEUP STUDIO LLC
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